

1 WHATLEY KALLAS, LLP  
2 Alan M. Mansfield (Of Counsel)  
(SBN 125998)  
3 amansfield@whatleykallas.com  
1 Sansome Street, 35<sup>th</sup> Floor, PMB #131  
San Francisco, CA 94104  
4 Tel: (415) 860-2503  
Fax: (888) 331-9633  
5 10200 Willow Creek Rd., Ste. 160  
6 San Diego, CA 92131  
Tel: (619) 308-5034  
7 Fax: (855) 274-1888

8 WHATLEY KALLAS, LLP  
9 Joe R. Whatley, Jr.  
(Admitted *Pro Hac Vice*)  
Patrick J. Sheehan  
(Admitted *Pro Hac Vice*)  
10 380 Madison Avenue, 23<sup>rd</sup> Floor  
New York, NY 10017  
11 Tel: (212) 447-7060  
Fax: (800) 922-4851

12 Attorneys for Plaintiffs

13 UNITED STATES DISTRICT COURT

14 NORTHERN DISTRICT OF CALIFORNIA

15 SAN FRANCISCO DIVISION

16 SANDRA McKINNON and KRISTEN  
17 TOOL, individually and on behalf of all others  
similarly situated,

Case No. 12-cv-04457- SC

CLASS ACTION

18 Plaintiffs,  
19 v.  
20 DOLLAR THRIFTY AUTOMOTIVE  
21 GROUP, INC. d/b/a DOLLAR RENT A CAR;  
DOLLAR RENT A CAR, INC.; DTG  
OPERATIONS, INC. d/b/a DOLLAR RENT  
A CAR; and DOES 1-10, inclusive,

**JOINT STIPULATION AND [PROPOSED]  
ORDER TO EXTEND TIME FOR  
BRIEFING AND HEARING ON  
DEFENDANTS' MOTION FOR  
PROTECTIVE ORDER; DECLARATION  
OF ALAN M. MANSFIELD IN SUPPORT**

22 Defendants.

Current Hearing Date: August 16, 2013  
Time: 10:00 a.m.  
Judge: Hon. Samuel Conti  
Courtroom: 1

23 Proposed New Date: August 23, 2013  
Time: 10:00 a.m.

24 [Complaint Filed: August 24, 2012]

25

26

1 Pursuant to Fed. R. Civ. P. 15(b)(4), Fed. R. Civ. P. 16(b)(4), and Civil L.R. 7-12, 6-1(b)  
2 and 6-2, and the Declaration of Alan M. Mansfield, it is hereby stipulated by and between the  
3 parties, through their respective counsel, as follows:

4 WHEREAS, on June 28, 2013, Defendants filed a Motion for Protective Order relating to  
5 certain outstanding discovery pursuant to Federal Rule of Civil Procedure 26 (Dkt. No. 66);

6 WHEREAS, on July 8, 2013, the parties filed a Joint Stipulation and Proposed Order to  
7 Extend Time for Briefing and Hearing on Defendants' Motion for Protective Order. (Dkt. No.  
8 69);

9 WHEREAS, on July 9, 2013, the Court entered the parties' proposed order. (Dkt. No. 70).  
10 Under the Court's new Order, Plaintiffs' opposition papers were due on or before July 19, 2013,  
11 and Defendants' reply papers in support of their motion were due on or before August 2, 2013.  
12 Furthermore, the hearing on Defendants' motion was continued to August 16, 2013 at 10:00 a.m.,  
13 before this Court unless the motion was assigned to a Magistrate Judge for consideration;

14 WHEREAS, in order to continue their on-going discussions to determine if agreement can  
15 be reached on the expeditious and efficient handling of initial discovery, the parties wish to extend  
16 the schedule as follows:

17 Plaintiffs' opposition papers in response to Defendants' Motion for Protective Order shall  
18 be due on or before July 26, 2013;

19 Defendants' reply papers in support of their Motion for Protective Order shall be due on or  
20 before August 9, 2013; and

21 The present hearing date on Defendants' Motion for Protective Order shall be continued to  
22 August 23, 2013 at 10:00 a.m., before this Court unless the motion is assigned to a Magistrate  
23 Judge for consideration;

24 WHEREAS, the parties will promptly inform the Court if an agreement is reached that  
25 moots Defendants' Motion for Protective Order.

26 / / /

27 / / /

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED THAT the parties agree to the above briefing schedule regarding Defendants' Motion for Protective Order.

Dated: July 17, 2013

WHATLEY KALLAS LLP

By: /s/ Alan M. Mansfield

ALAN M. MANSFIELD  
amansfield@whatleykallas.com  
1 Sansome Street, 35<sup>th</sup> Floor, PMB #131  
San Francisco, CA 94104  
Tel: (415) 860-2503  
Fax: (888) 331-9633  
10200 Willow Creek Rd., Ste 160  
San Diego, CA 92131  
Tel: (619) 308-5034  
Fax: (855) 274-1888

JOE R. WHATLEY JR. (Admitted *Pro Hac Vice*)  
jwhatley@whatleykallas.com  
PATRICK J. SHEEHAN (Admitted *Pro Hac Vice*)  
psheehan@whatleykallas.com  
380 Madison Avenue, 23<sup>rd</sup> Floor  
New York, NY 10017  
Tel: (212) 447-7060  
Fax: (800) 922-4851

Attorneys for Plaintiffs SANDRA McKINNON and KRISTEN TOOL

Dated: July 17, 2013

JENNER & BLOCK LLP

By: /s/ John F. Ward, Jr..

JOHN F. WARD, JR.

ROSS B. BRICKER (Admitted *Pro Hac Vice*)  
rbricker@jenner.com  
JOHN F. WARD, JR. (Admitted *Pro Hac Vice*)  
jward@jenner.com  
JENNER & BLOCK LLP  
353 N. Clark Street  
Chicago, IL 60654-3456  
Telephone: 312-222-9350  
Facsimile: 312-527-0484

KENNETH E. KELLER (State Bar No. 71450)  
kkeller@ksrh.com  
TRACY M. CLEMENTS (State Bar No. 184150)  
tclements@ksrh.com